

DEPARTMENT OF SOCIAL SERVICES

744 P Street, Sacramento CA 95814



December 8, 1992

ALL-COUNTY LETTER NO. 92-108

TO: COUNTY WELFARE DIRECTORS

REASON FOR THIS TRANSMITTAL

- ☐ State Law Change
- ☐ Federal Law or Regulation Change
- ☐ Court Order
- ☐ Clarification Requested by One or More Counties
- ☒ Self-Initiated by SDSS
- ☐ Administrative, Operational, or Fiscal Instructions

SUBJECT: FOOD STAMP CORRECTIVE ACTION PLAN


Attached for your information is a copy of California's Food Stamp Corrective Action Plan (CAP) which was sent to the Food and Nutrition Service (FNS) as required by Federal regulations.

State original error rate (SOER) findings of quality control (QC) payment errors for the first six months of Federal Fiscal Year (FFY) 1992 (October 1991 through March 1992) are presented in this Plan. The SOER for this period which includes issuances to ineligible, overissuances and underissuances was 8.8 percent. This compares favorably to the rates recorded in the two prior six month periods (October 1990 through March 1991 and April through September 1991) of 10.1 and 9.7 percent, respectively.

In Part I of this Plan, we present an overview of state level error reduction activities. Part II discusses county error rate data for the 34 largest counties and an overview of county level error reduction efforts. This data shows that 23 of these 34 counties had error rates below the FFY 1991 federal tolerance level of 10.31 percent.

We appreciate the hard work and attention you have directed toward accuracy improvement in the Food Stamp Program and congratulate you for the significant improvement in the statewide Food Stamp error rate for the first half of FFY 1992. We will make every effort to assist you in achieving a high level of performance and issuance accuracy to help assure that California will not be subject to a federal fiscal sanction for FFY 1992.

If you have any comments or questions about this Plan, please contact Ron Thoreson, Chief, Operations Improvement Bureau at (916) 475-2154.


MICHAEL C. GENEST
Deputy Director
Welfare Programs Division

Attachments

cc: CWDA

FOOD STAMP PROGRAM
CORRECTIVE ACTION PLAN
OCTOBER 1991 - MARCH 1992

STATE OF CALIFORNIA
DEPARTMENT OF SOCIAL SERVICES

NOVEMBER 1992

INTRODUCTION

In accordance with Title 7, Code of Federal Regulations, Part 275.17, this document provides to the Food and Nutrition Service (FNS) California's Corrective Action Plan (CAP) for reducing errors in the Food Stamp Program.

The CAP is in two parts. Part I consists of error rate data analysis of the Federal quality control (QC) sample for the review period of October 1991 through March 1992. This part also provides an overview of current State level accuracy improvement activities.

Part II reports on County level corrective action. It consists of error rate data analysis based on results of the QC reviews conducted by Counties for the review period of October 1991 through March 1992 and an overview of County level accuracy improvement efforts. This overview summarizes the broad range of activities occurring in the 34 QC Counties; details of specific County error reduction activities can be found in the individual corrective action plans submitted to the State Department of Social Services (SDSS) by the Counties every six months.

The section on intensive focus Counties found in Part II of this report for the previous report period has been deleted. Intensive activities with the three designated Counties (Los Angeles, San Diego and Fresno) have been redirected to the "Seven County Partnership Effort" which is described under Corrective Action S-46-QC in Part I, Section 4.

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PART I

STATE LEVEL ACCURACY IMPROVEMENT

1. ERROR RATE DATA ANALYSIS

Error rates for individual counties are displayed in Charts 15 and 16. The results of the county QC reviews for the October 1991 through March 1992 review period are shown in Chart 15. Chart 16 presents the cumulative payment error rates (CPERs) for the counties for the last four review periods. This information assists the Operations Improvement Bureau in identifying error rate trends in the counties and recognizing superior or improved performance.

Thirty-three counties reported their error rates for the October 1991 through March 1992 review period. Because of its large caseload size, error rates for Los Angeles County are derived from its portion of the federal sample which is completed by State staff.

A comparison of county QC review findings for the October 1991 through March 1992 period with findings for the previous period reveals that CPERs increased in 15 counties and decreased in 18 counties. Overall, 23 counties (70 percent of the reporting QC counties) had CPERs below the federal tolerance level of 10.31 percent recorded in FFY 1991.

County QC review findings represent the best information available on specific county error rates. The State, however, does not oversee the county sampling and review processes nor validate the results.

We previously implemented a corrective action to assist Counties with Shelter Deduction errors. The action, dissemination of error reduction products targeted specifically at Shelter Deduction errors, and a recent regulatory change to simplify shelter reporting are described under Corrective Action S-45-QC in Section 4, Part I.

Citizenship and Alienage was the fourth leading cause of errors in the current period with PA or GA Benefits and Other Government Benefits ranking as fifth and sixth. Unemployment Compensation, Standard Utility Allowance and RSDI Benefits each moved down five positions comparing the current with the previous period. They were fifth through seventh, respectively, in the prior period and are in the tenth through twelfth positions, respectively, in this current review period.

Chart 7 displays error element concentrations for the ineligible/overissuance component of the CPER. For this component, Wages and Salaries was again the leading cause of errors. Chart 8 displays comparable information for the underissuance component. For this component, the top error element was, as last quarter, Shelter Deduction. Charts 9, 10, and 11 display in pie charts the top error elements for the current review period for the cumulative rate, the ineligible/overissuances component, and for underissuances.

Chart 12 provides agency and client error cause information for dollar and case error rates. Client caused errors were responsible for 48.7 percent of ineligible/overissuance dollar errors, but only 14.1 percent of the underissuance dollar errors. We believe the comparably low percentage of client caused underissuance dollar errors is due, in part, to the willingness of clients to report changes that will result in increased benefits.

Chart 12 shows that agency caused errors remained at the same level in the prior and current period at 65.0 for the cumulative rate. They decreased for the overissuance/ineligible component, from 53.6 to 51.3 percent. For the underissuance component, agency caused errors increased from 85.4 to 85.9 percent.

Chart 13 provides a breakdown of agency and client causes for both case and dollar errors for the current period. As noted in Chart 12, agency caused errors accounted for 65.0 percent of all dollar errors. The largest cause of agency errors was Failure to Take Action, accounting for 46.8 percent of all dollar errors, an increase from 44.4 percent during the previous period. The Operations Improvement Bureau has been considering ways to reduce Agency Failure to Take Action errors as part of Corrective Action S-42-QC, described in Section 4, Part I.

Chart 14 displays negative error rate information. The negative error rate for the October 1991 through March 1992 review period was 2.8 percent. This is a significant 3.8 percent decrease from the 6.6 negative error rate for the previous period of October 1990 through September 1991 and continues the downward trend recorded during the last three years. Effective January, 1988, the Quality Control (QC) Branch of the State Department of Social Services required analysts to attempt collateral contacts in all QC sample cases with a Food Stamp denial or discontinuance not supported by case record documentation. These collateral contacts served to validate some County negative actions which would have previously been cited as errors. In addition, the Integrated Review and Improvement Study (IRIS) has included a negative action component since 1984. Through case review, the IRIS identifies cases erroneously denied or discontinued due to an incorrect application of the regulations or cases that do not have sufficient documentation to support the negative action. Based on the case review findings the IRIS team conducts a system review to identify the main elements contributing to the erroneous or insufficiently documented negative actions. In recent years IRIS team members have worked closely with County staff to alert them to and help them resolve the factors contributing to these deficiencies. In addition, the IRIS process includes a written follow-up procedure, the County Program Improvement Response (PIR), to assure Counties take action on the identified program deficiencies. An onsite evaluation of the County's PIR is also conducted during the subsequent IRIS review. We feel the QC collateral contact requirement and the IRIS review of negative actions have contributed to the downward trend in the negative error rate and plan to continue them in order to maintain or improve it.

CHART 1

FOOD STAMP
PAYMENT AND CASE ERROR RATES
ORIGINAL STATE FINDINGS

Combined Ineligibles and Overissuances

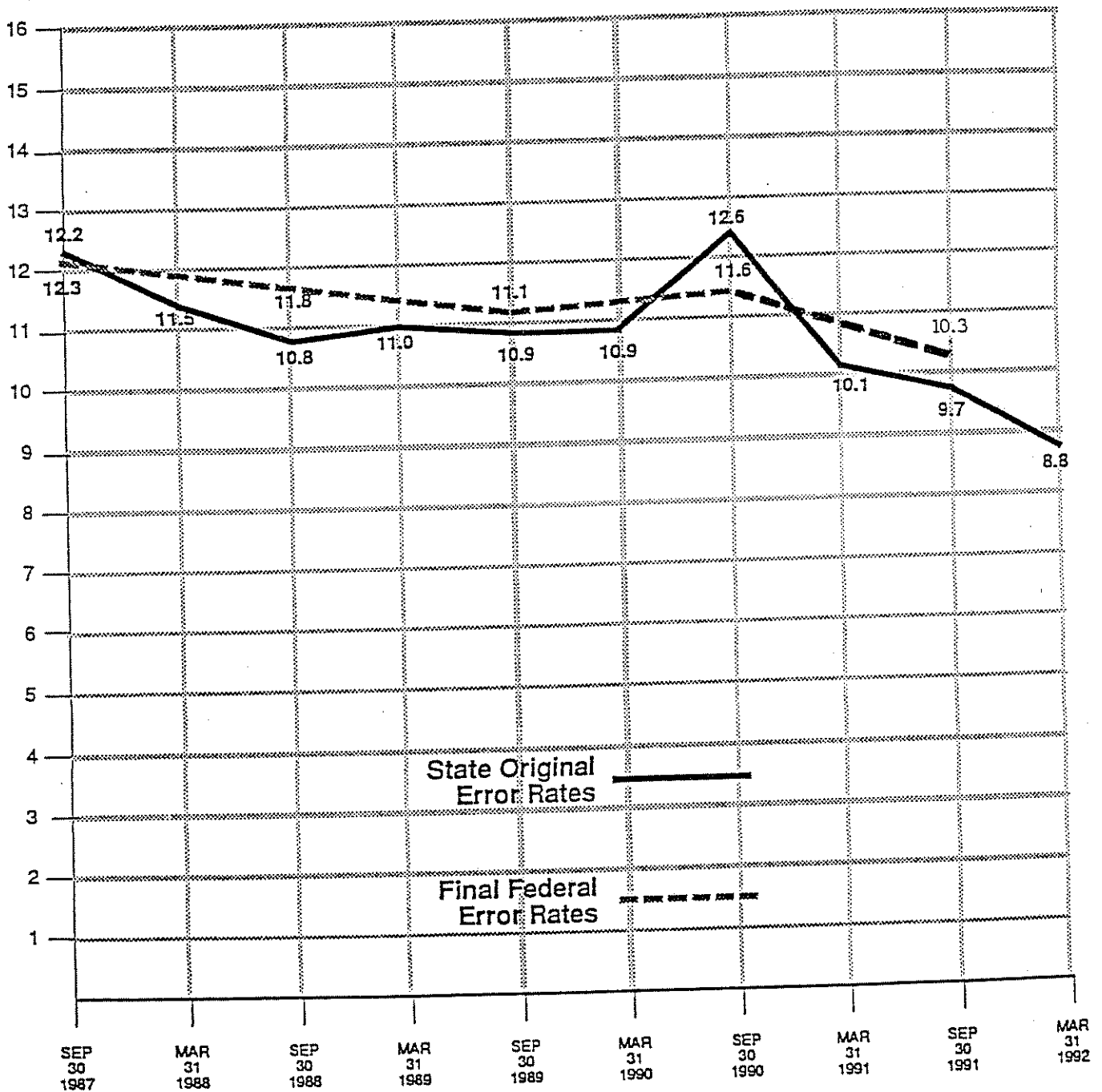
<u>Period</u>	<u>Payment Error</u>	<u>Case Error</u>
October 1987 - March 1988	6.4	12.5
April 1988 - September 1988	7.1	14.5
October 1988 - March 1989	7.6	14.5
April 1989 - September 1989	7.0	14.5
October 1989 - March 1990	6.7	14.8
April 1990 - September 1990	8.6	16.0
October 1990 - March 1991	6.5	14.3
April 1991 - September 1991	6.2	15.3
October 1991 - March 1992	5.3	12.8

Combined Ineligibles, Overissuances
and Underissuances

	<u>Payment Error</u>	<u>Case Error</u>
October 1987 - March 1988	11.5	24.3
April 1988 - September 1988	10.8	25.3
October 1988 - March 1989	11.0	25.9
April 1989 - September 1989	10.9	26.6
October 1989 - March 1990	10.9	28.2
April 1990 - September 1990	12.6	28.8
October 1990 - March 1991	10.1	26.5
April 1991 - September 1991	9.7	27.0
October 1991 - March 1992	8.8	25.8

CHART 2

FOOD STAMP
PAYMENT ERROR RATE TREND
ORIGINAL STATE FINDINGS
FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES



* CHART 3

FOOD STAMP
PAYMENT ERROR RATE TREND
ORIGINAL STATE FINDINGS
FOR INELIGIBLES AND OVERISSUANCES

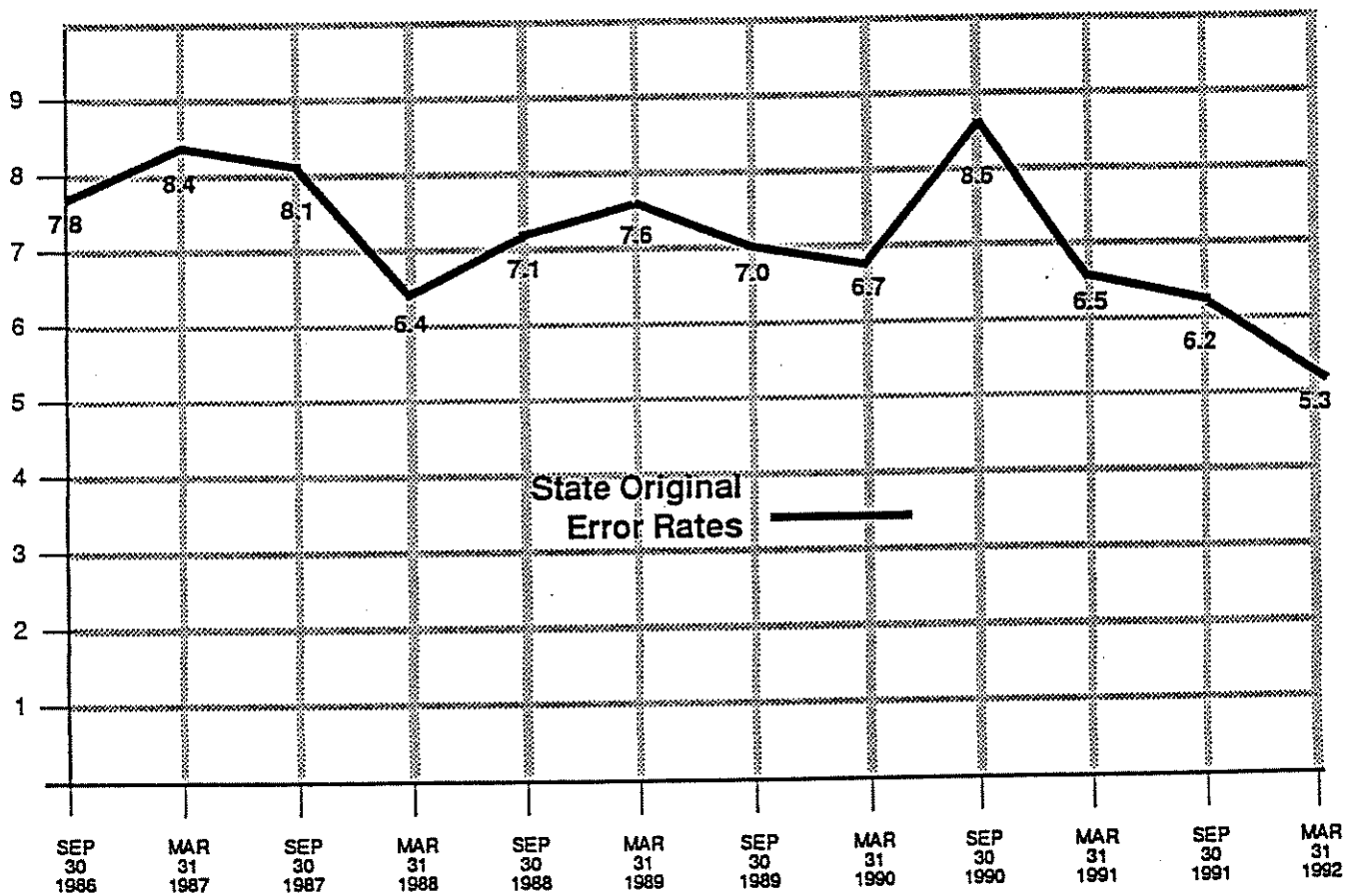


CHART 4

FOOD STAMP
PAYMENT ERROR RATE TREND
ORIGINAL STATE FINDINGS
FOR UNDERISSUANCES

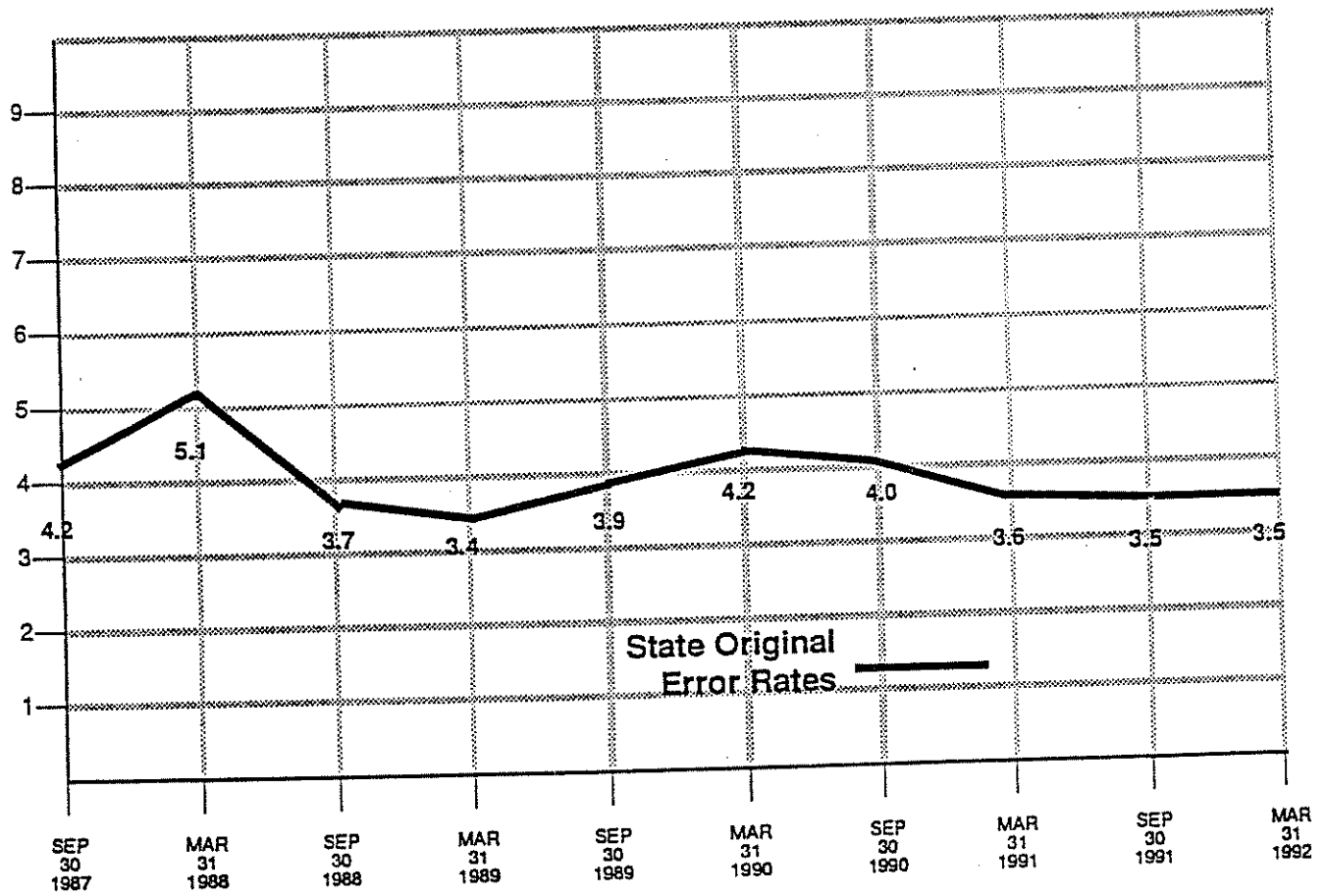


CHART 5

FOOD STAMP

ERROR CONCENTRATIONS
 FOR OVERISSUANCES, INELIGIBLES, AND UNDERISSUANCES
 April - September 1991

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Wages and Salaries (311)	21.34%	2.07%	\$27,484,137
2. Shelter Deduction (363)	19.11	1.86	24,608,516
3. Living Arrangement and Household Composition (150)	17.18	1.67	22,123,198
4. PA or GA Benefits (344)	9.74	0.94	12,537,674
5. Unemployment Compensation (334)	8.13	0.79	10,472,997
6. Standard Utility Allowance (364)	4.02	0.39	5,176,674
7. RSDI Benefits (331)	3.13	0.30	4,024,623
8. Child or Dependent Care (323)	2.93	0.28	3,770,279
9. Educational Grants/ Scholarships/Loans (345)	2.74	0.27	3,528,380
10. Contributions/Income In Kind (342)	2.60	0.25	3,351,359
11. Deemed Income (343)	2.03	0.20	2,614,091
12. Other Government Benefits (336)	1.77	0.17	2,274,137
13. Citizenship and Alienage (130)	1.64	0.16	2,109,561
14. Residency (140)	1.22	0.12	1,570,950
15. Other Earned Income (346)	0.81	0.08	1,047,300
16. Combined Net Income (372)	0.58	0.06	748,071
17. Combined Gross Income (371)	0.43	0.04	553,573
18. Self Employment (312)	0.36	0.03	463,804
19. Other	0.24	0.02	314,190
	100.00%	9.70%	\$128,768,665

CHART 6

FOOD STAMP

ERROR CONCENTRATIONS
FOR OVERISSUANCES, INELIGIBLES, AND UNDERISSUANCES
October 1991 - March 1992

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Wages and Salaries (311)	27.08%	2.38%	\$26,751,590
2. Shelter Deduction (363)	22.27	1.96	21,999,283
3. Living Arrangement and Household Composition (150)	11.61	1.02	11,469,094
4. Citizenship and Alienage (130)	5.64	0.50	5,575,655
5. PA or GA Benefits (344)	5.45	0.48	5,387,874
6. Other Government Benefits (336)	4.52	0.40	4,463,413
7. Combined Gross Income (371)	3.67	0.32	3,625,621
8. Contributions/Income in Kind (342)	3.29	0.29	3,250,058
9. Veteran's Benefits (332)	3.14	0.28	3,105,611
10. Unemployment Compensation (334)	3.10	0.27	3,062,277
11. Standard Utility Allowance (364)	2.57	0.23	2,542,268
12. RSDI Benefits (331)	2.41	0.21	2,383,376
13. Arithmetic Computation (520)	2.38	0.21	2,354,487
14. Child or Dependent Care (323)	2.22	0.20	2,195,595
15. Educational Grants/Loans	0.32	0.03	317,783
16. Earned Income Deductions	0.18	0.02	173,336
17. Other Unearned Income	0.12	0.01	115,560
	100.00%	8.80%	\$98,772,881

CHART 7

FOOD STAMP

ERROR CONCENTRATIONS FOR OVERISSUANCES AND INELIGIBLES October 1991 - March 1992

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Wages and Salaries (311)	35.45%	1.88%	\$21,175,935
2. Shelter Deduction (363)	14.20	0.75	8,479,040
3. Living Arrangement and Household Composition (363)	9.63	0.51	5,748,992
4. PA or GA Benefits (344)	7.50	0.40	4,477,858
5. Other Government Benefits (366)	6.60	0.35	3,943,404
6. Combined Gross Income (371)	6.07	0.32	3,625,621
7. Veteran's Benefits (332)	5.20	0.28	3,105,611
8. Contributions/Income In Kind (342)	5.08	0.27	3,033,388
9. RSDI Benefits (331)	3.99	0.21	2,383,376
10. Child or Dependent Care (323)	1.74	0.09	1,040,019
11. Arithmetic Computation (520)	1.69	0.09	1,011,129
12. Unemployment Compensation (334)	1.62	0.09	967,795
13. Standard Utility Allowance (364)	0.92	0.05	548,899
14. Educational Grants/ Scholarships/Loans (345)	0.31	0.02	187,781
	100.00%	5.30%	\$59,728,848

CHART 8

FOOD STAMP

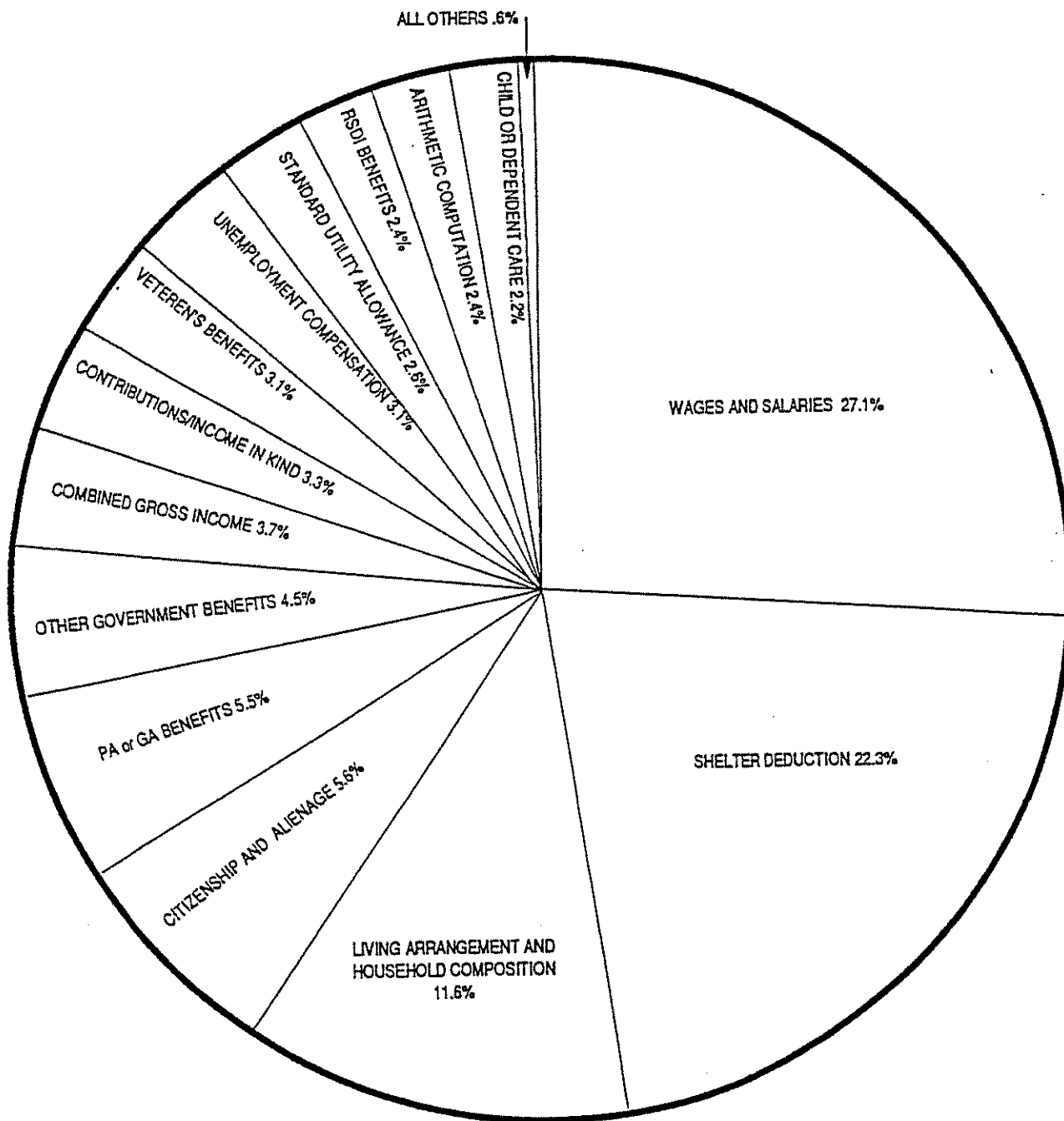
 ERROR CONCENTRATIONS
 FOR UNDERISSUANCES
 October 1991 - March 1992

Error Element	Percent of Total Misspent Dollars*	Payment Error Rate*	Projected Annual Cost
1. Shelter Deduction (363)	34.63%	1.21%	\$13,520,242
2. Living Arrangement and Household Composition (150)	14.65	0.51	5,720,103
3. Wages and Salaries (311)	14.28	0.50	5,575,655
4. Citizenship and Alienage (130)	14.28	0.50	5,575,655
5. Unemployment Compensation (334)	5.36	0.19	2,094,484
6. Standard Utility Allowance (364)	5.11	0.18	1,993,369
7. Arithmetic Computation (520)	3.44	0.12	1,343,357
8. Child or Dependent Care (323)	2.96	0.10	1,155,576
9. PA or GA Benefits (344)	2.33	0.08	910,016
10. Other Government Benefits (336)	1.33	0.05	520,009
11. Contributions/Income In Kind (342)	0.55	0.02	216,671
12. Earned Income Deductions (321)	0.44	0.02	173,336
13. Educational Grants/Loans (345)	0.33	0.01	130,002
14. Other Unearned Income (346)	0.30	0.01	115,558
	<hr/>	<hr/>	<hr/>
	100.00%	3.50%	\$39,044,033

*Percents may not add to totals due to rounding.

CHART 9

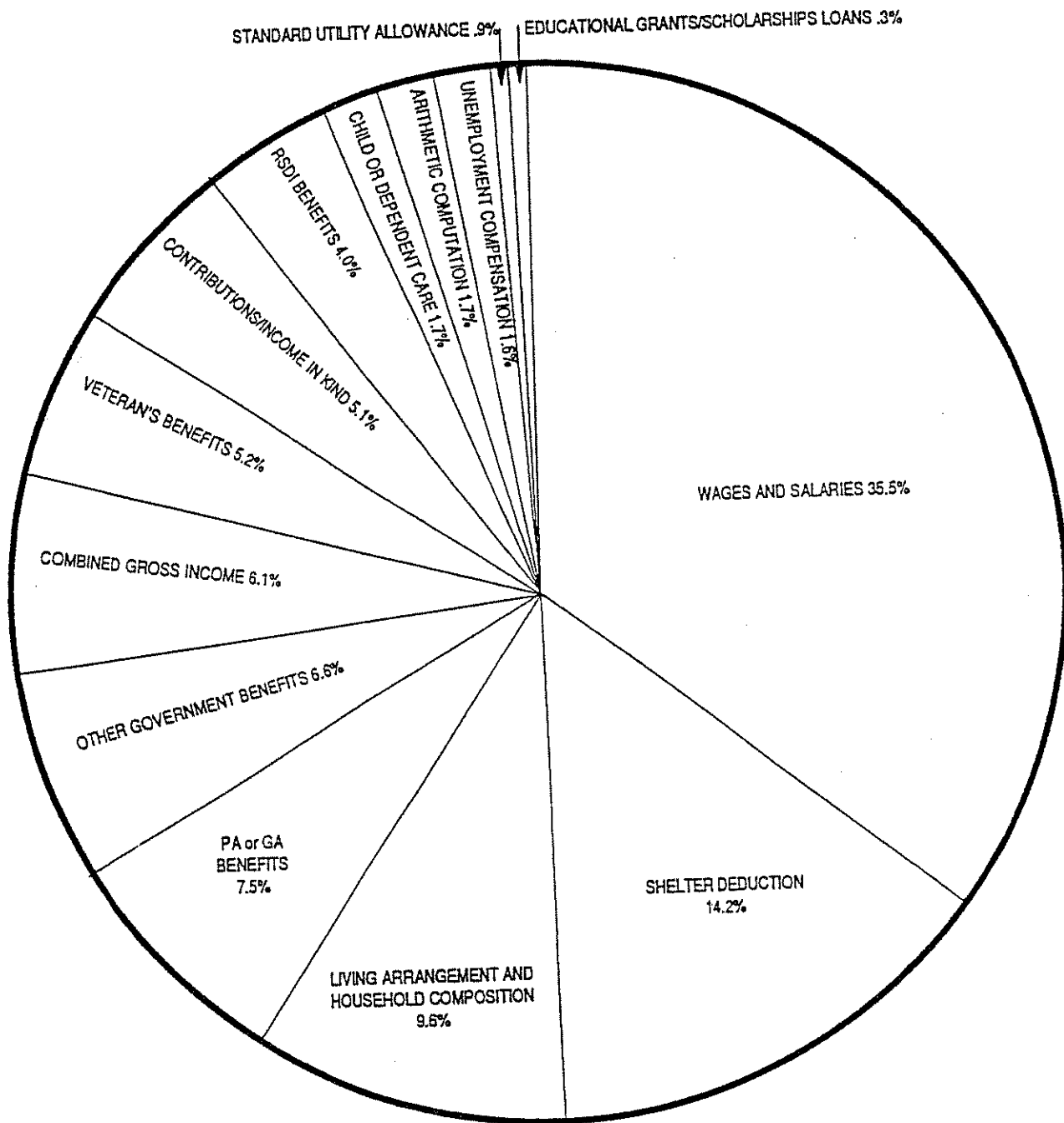
FOOD STAMP
PERCENT OF DOLLARS IN ERROR
FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES*
OCTOBER 1991 - MARCH 1992



*Percents may not add to 100 percent due to rounding.

CHART 10

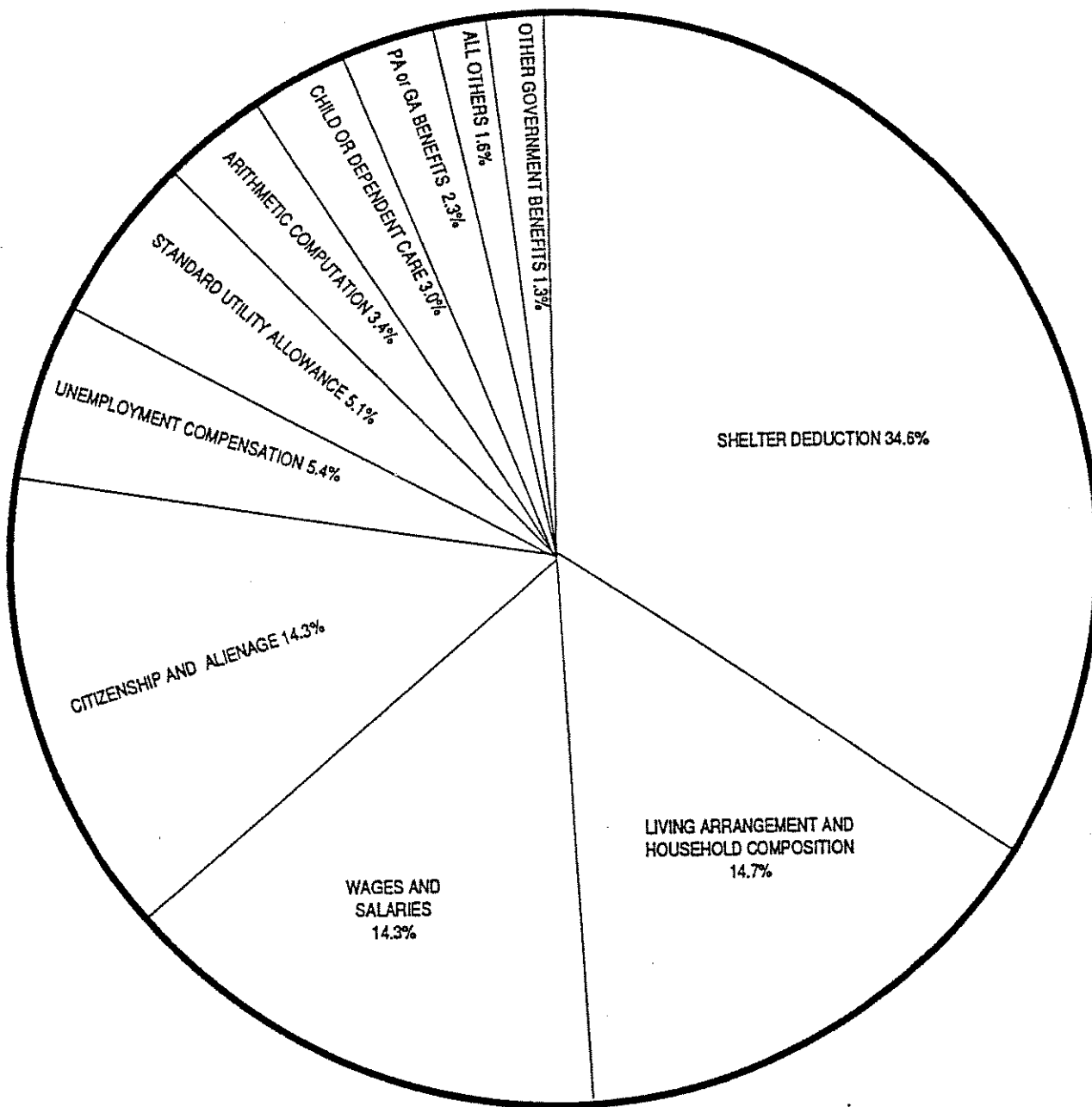
FOOD STAMP
PERCENT OF DOLLARS IN ERROR
FOR INELIGIBLES AND OVERISSUANCES*
OCTOBER 1991 - MARCH 1992



*Percents may not add to 100 percent due to rounding.

CHART 11

FOOD STAMP
PERCENT OF DOLLARS IN ERROR
FOR UNDERISSUANCES*
OCTOBER 1991 - MARCH 1992



* Percents may not add to 100 percent due to rounding.

CHART 12

FOOD STAMP CASE AND DOLLAR ERRORS AGENCY/CLIENT DISTRIBUTIONS

PERIOD: APRIL 1991 - SEPTEMBER 1991:

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
Ineligibles, Overissuances and Underissuances Combined	Agency: 65.6% Client: 34.4 Total: 100.0	65.0% 35.0 100.0
Ineligibles and Overissuances Combined	Agency: 57.7 Client: 42.3 Total: 100.0	53.6 46.4 100.0
Underissuances	Agency: 75.9 Client: 24.1 Total: 100.0%	85.4 14.6 100.0%

PERIOD: OCTOBER 1991 - MARCH 1992:

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
Ineligibles, Overissuances and Underissuances Combined	Agency: 72.3% Client: 27.7 Total: 100.0	65.0% 35.0 100.0
Ineligibles and Overissuances Combined	Agency: 58.8 Client: 41.2 Total: 100.0	51.3 48.7 100.0
For Underissuances	Agency: 85.5 Client: 14.5 Total: 100.0%	85.9 14.1 100.0%

CHART 13

FOOD STAMP CASE AND DOLLAR ERRORS AGENCY/CLIENT CAUSE DISTRIBUTIONS October 1991 - March 1992

	<u>CASE ERRORS</u>	<u>DOLLAR ERRORS</u>
FOR INELIGIBLES, OVERISSUANCES AND UNDERISSUANCES		
<u>Agency Errors:</u>		
Failure to Take Action.....	48.9%.....	46.8%
Policy Incorrectly Applied.....	13.9	9.9
Arithmetic Computation.....	4.4	2.0
Other Agency Errors.....	5.1	6.3
Total.....	72.4	65.0
<u>Client Errors:</u>		
Information Not Reported.....	23.3	31.6
Reported Information is Not Correct.....	4.4	3.4
Total.....	27.7%.....	35.0%

FOR INELIGIBLES AND OVERISSUANCES

<u>Agency Errors:</u>		
Failure to Take Action.....	44.1%.....	39.7%
Policy Incorrectly Applied.....	8.8	3.2
Arithmetic Computation.....	1.5	0.8
Other Agency Errors.....	4.4	7.6
Total.....	58.8	51.3
<u>Client Errors:</u>		
Information Not Reported.....	33.8	43.6
Reported Information is Not Correct.....	7.4	5.0
Total.....	41.2%.....	48.7%

FOR UNDERISSUANCES

<u>Agency Errors:</u>		
Failure to Take Action.....	53.6%.....	57.5%
Policy Incorrectly Applied.....	18.8	20.2
Arithmetic Computation.....	7.2	3.9
Other Agency Errors.....	5.8	4.3
Total.....	85.5	85.9
<u>Client Errors:</u>		
Information Not Reported.....	13.0	13.2
Reported Information is Not Correct.....	1.4	1.0
Total.....	14.5%.....	14.1%

CHART 14

FOOD STAMP NEGATIVE ERROR RATE ORIGINAL STATE FINDINGS

<u>Period*</u>	<u>Error Rate</u>
October 1983 - September 1984	2.54%
October 1984 - September 1985	4.43
October 1985 - September 1986	5.96
October 1986 - September 1987	9.30
October 1987 - September 1988	12.57
October 1989 - September 1990	8.30
October 1990 - September 1991	6.60
October 1991 - March 1992	2.81

*Federal Fiscal Year data are presented for all review periods. There is no negative error rate for FFY 1989. The negative error rate sample was discontinued during that year because California, represented by San Diego County, participated in a nationwide study of Food Stamp negative actions.

2. OVERVIEW OF STATE ACCURACY IMPROVEMENT ACTIVITIES

California's Food Stamp Program is administered by the Counties under the supervision of the State Department of Social Services (SDSS). Because the delivery of services takes place at the County level, the SDSS takes a different approach to accuracy improvement than would be appropriate for States that are directly responsible for program administration.

Staff of the Operations Improvement Bureau work to support, motivate, and monitor County level error reduction activities recognizing that the most effective efforts usually take place at the level of service delivery. State staff are involved in a variety of county level accuracy improvement activities as well as the development and implementation of State level corrective actions. This approach was adopted after reviewing Food Stamp Program operations in California because it was determined to be the most efficient method of mobilizing both State and County resources for effective accuracy improvement.

In this section, we provide an overview of some of the ongoing accuracy improvement activities occurring at the State level.

- o Income and Eligibility Verification System (IEVS). This system provides the Counties with a broad range of automated verification systems. The information is used to verify eligibility for both applicants and recipients and/or identify potential fraud. Computer matches verify unemployment insurance data, disability insurance data, wage information from within California and throughout the nation, Social Security benefits, unearned income from bank accounts or other investments, and duplicate aid.

This system represents an enhancement of three computer match systems that were already in place: the Integrated Earnings Clearance/Fraud Detection System which identifies unreported wages and duplicate aid for AFDC, Food Stamp and SSI/SSP recipients; the Payment Verification System which provides information on recipients who receive or will receive Retirement Survivors Disability Insurance, Unemployment Insurance or Disability Insurance; and the Asset Match System which matches the welfare recipient file against the State Franchise Tax Board's interest and dividend file.

In 1990, the information available to counties in the area of wage and asset matching was expanded to include nationwide wages and investment income. Nationwide wage data is sent to counties monthly from the Beneficiary Earnings Exchange Record (BEER). Information from the Internal Revenue Service (IRS) asset matches, including information on out-of-state investments, are provided to Counties annually.

Effective December 1991, the applicant system added the Wire to Wire Third Party Verification system which provides social security number validation and Title II and XVI benefit information via computer link between California and Baltimore.

In addition to the above matches, the SDSS has added the Systematic Alien Verification for Entitlement (SAVE) and the Homeless Assistance Program Indicator (HAPI) systems. SAVE verifies the immigration status of all

aliens who apply for and/or are recipients of AFDC and Food Stamps. HAPI creates a data base of individuals who have received Homeless Assistance to prevent duplicate or improper payments.

Currently, the SDSS is pilot testing the USDA Food Stamp Disqualification system and a statewide property match system known as DATAQUICK. The disqualification information will be available through IEVS and the property match will be available on a case-by-case basis when testing has been completed.

The Fraud Bureau also conducts periodic reviews of IEVS operations in Counties to discuss IEVS related issues. Quarterly meetings are held with County IEVS coordinators. At these IEVS "user" meetings, forthcoming changes to IEVS are discussed and IEVS problems are identified. Counties provide a valuable source of input to improve the IEVS system.

- o Fraud Early Detection Program. California has long had a formal pre-eligibility fraud detection program, entitled Fraud Early Detection (FRED). The FRED Program provides for investigative personnel to be placed in direct physical access to intake units in order to provide expeditious investigative service to those units. The program is separate and parallel to the intake function and does not interfere with normal intake procedures or delay the payment of benefits.

Prior to 1991, slightly less than half of California's Counties participated in this program. In July of 1991, legislation passed that provides for 100 percent state funding, i.e., no County costs for Counties that elect to participate. The legislation required the Counties to submit an operating plan for SDSS approval prior to the release of 100 percent funding. To date, 45 Counties have opted to participate. Two more are in the process of developing operating plans. These 47 Counties represent approximately 95 percent of California's welfare caseload.

During the period of October 1990 through September 1991 (prior to implementation of the 100 percent program), over 50,000 Food Stamp (NA and PA) applications were referred to the program; of these, approximately 24,000 were denied, reduced or withdrawn. As the average (NA and PA) Food Stamp case receives \$100.00 a month for 15 months, it is estimated that almost \$36 million in erroneous Food Stamp benefits were prevented as a result of this program. Since implementation of the 100 percent program, denials and reductions in benefits have exceeded 32,000 a year. This results in an increased estimated annual savings of \$48 million by preventing the erroneous issuance of Food Stamp benefits.

- o Review and Evaluation Bureau. The Review and Evaluation Bureau's (REB) goal is to reduce quality control caused errors in the sample by more accurately identifying true errors in the Food Stamp federal sample and creating a more accurate Management Information System (MIS). REB is moving toward full automation of the Quality Control (QC) system to replace the manual processes.

The steps REB is taking toward full automation are:

- o Automated sample selection
- o Automated integration
- o Automated data base inquiries
- o Automated ordering of third party collateral information
- o Streamlining the Worksheet for Integrated AFDC and Food Stamps Quality Control Reviews Facesheet (QC 1), including pre-printed statements in certain elements
- o Automating the QC 1, which will replace the hard copy worksheet and schedule with a data file
- o Key data entry into file for California's 52 Counties (excluding Napa County)
- o Ability to download Napa County's case file information to the data file; also known as the automated QC 1
- o Ability to complete the Integrated Review Schedule by migration of data from the QC 1

Eventually, REB will have a complete statewide central database, wherein REB will have direct on-line access to all county case file information and statewide sample and integration capability.

The Bureau is also implementing more efficient procedures to better identify Food Stamp errors. REB has continued its' progress toward full automation in an effort to gather Food Stamp data that will accurately measure state and County performance of the administration of Food Stamp benefits. Since 1981, REB has continued its efforts to effectively and efficiently provide evaluation data to program managers that are administering and managing the Food Stamp program, in an effort to stay below the federally established error tolerance level.

REB continues to work through a Strategic Planning Process aimed at developing and implementing a vision for the future. The vision will improve the process by which quality control Food Stamp reviews are completed and improve Food Stamp program performance. REB's automation efforts have allowed us to gather relevant information from the client population to address emerging issues and possible need for change in the Food Stamp program.

The REB Training Plan for July 1, 1992 through March 31, 1993 includes training for the regulation changes. This will include major changes such as Welfare Reform and Ineligible Aliens. This effort is aimed at uniform and accurate application of Food Stamp regulations and Food Stamp quality control procedures.

REB's Policy and Administrative Support Unit has recently implemented a change to the Federal Difference Process. This incorporates cooperation and communication with our Legal and Program Units to better understand the issues such as court cases and Federal/State exception issues. The intent is to avoid Federal Difference findings by timely incorporation of legal or policy changes into State quality control review processes.

- o The Accuracy Improvement Bureau Clearinghouse. The Operations Improvement Bureau encourages Counties to share information and ideas. A Clearinghouse of corrective action products and resources has been operational since 1987. The contents of the Clearinghouse represent the efforts of Counties and other entities to design products that emphasize error prevention and corrective action. These products have been effective tools for the Counties that designed them and may be of benefit to other Counties as well. Some products have also been developed in regional corrective action workshops attended by County, State, and Federal staff. In addition, the Clearinghouse serves as a vehicle for the distribution of products developed as a result of State level corrective action.

Products in the Clearinghouse are continually updated. They are classified under the following headings: AFDC Eligibility, CA-7 Processing, Case Review/Supervisory Review, Caseload Management, Choosing the Right Corrective Action, Client Caused Errors, Corrective Action Committees, Evaluation, Error-Prone Profiles/Identifying High Risk Factors, Food Stamp Eligibility, Fraud Prevention, Problem Solving, Time Management, Training, and Worker Performance Standards/Employee Expectations. The Clearinghouse Catalog also includes information on videotape availability.

Clearinghouse products are available to Counties upon request. Operations Improvement Bureau consultants are familiar with these products and recommend appropriate products to Counties.

- o Annual Statewide Accuracy Improvement Conference. From 1986 through 1990, an annual statewide conference was jointly sponsored by Federal, State and County government organizations to give welfare professionals throughout the State the opportunity to meet each other and discuss corrective action issues. Due to severe State budget constraints and the possibility of impending State layoffs in 1992, SDSS opted to cancel the annual conference. However, Accuracy Improvement Consultants continue to assist Counties in preparing and presenting regional accuracy improvement conferences.

- o Regional Eligibility Worker and Eligibility Supervisor Conferences. Operations Improvement Bureau staff work jointly with County staff to develop and present eligibility worker and eligibility supervisor conferences. The first regional eligibility worker conference took place in July 1988. Since that time, numerous eligibility worker and supervisor conferences have taken place at various locations throughout the State. Currently, five regional conferences occur each year. The Bay Area, Northern/Motherlode and Southern Counties regional corrective action committees each sponsor an annual eligibility worker conference. The Valley Nine Network and Southern Counties regional corrective action committees each sponsor an annual supervisors conference.

In addition, the Valley Nine Network holds eligibility worker field days with rotating host Counties three times a year. The primary objectives for these conferences and field days are to raise participant awareness of corrective action issues and to enhance networking among welfare professionals. All have been very successful.

- o Problem Solving Training. To assist Counties in developing the necessary problem solving skills for effective corrective action, the Operations Improvement Bureau makes several types of training sessions available to Counties.

One of these is the Nine-Step Problem Solving Workshop. This is a full day workshop designed to teach problem solving skills to supervisors, lead eligibility workers, managers and other staff directly involved in corrective action planning. Participants work in small groups to analyze problems, identify causes, and develop solutions along with implementation/evaluation plans. During this review period, the Nine-Step Workshop was presented to members of Yolo County's Corrective Action Committee.

The Operations Improvement Bureau also presents a half-day workshop especially for County line staff. This workshop, Quality Control/Accuracy Improvement Awareness Training, provides eligibility workers and supervisors with information about the quality control process in their County and about skills they can use to solve problems at the unit level. This training focuses on helping line staff realize that they can make a difference in lowering California's error rate.

Production of these and other training sessions is a cooperative effort by both State and County staff. Participants in these workshops not only enhance their problem solving skills, they also enjoy the opportunity to network and share ideas with other welfare professionals.

3. PLANNED CORRECTIVE ACTIONS

In State fiscal year (FY) 1992, California suffered budget constraints which impacted the SDSS and its Welfare Division. Department-wide reorganization continued from the prior FY which changed reporting relationships and Bureau responsibilities. As a result, during the review period of October 1991 through March 1992, no new corrective actions were implemented. However, activity continued on several previously implemented corrective actions including the Seven County Partnership Effort described in the following section.

4. STATUS OF PRIOR CORRECTIVE ACTIONS

This part of the Plan presents information on the progress of previously implemented corrective actions. They are:

- S-42-QC Review of Action on Reported Changes
- S-44-QC QC Error Case Correction Project
- S-45-QC Products For Shelter Deduction Error
- S-46-QC Seven County Partnership Effort

Number

S-42-QC

Title

Review of Action on Reported Changes

Description

The continuing module, which has been a regular part of the Integrated Review and Improvement Study (IRIS), was expanded effective FFY 1990 to include a review of systems which are key in preventing errors which occur when workers fail to act on reported changes. Initially the three systems which were examined included: 1) the CA-7 process; 2) supervisory reviews; and 3) procedures for handling uncovered caseloads. Based on preliminary data, effective with FFY 1991, the uncovered caseload system review was replaced with a review of eligibility worker (EW) training. In addition, as failure to act on reported changes was a major source of statewide errors, the Seven-County project also reviewed how the large Counties have tackled this problem (see S-46-QC for details of this project).

For the review period of October 1991 through March 1992, Failure to Take Action agency dollar errors increased .2 percent statewide from 4.4 percent to 4.6 percent compared with the prior review period. However, since its inception, the Action on Changes Module has been conducted two times in the same eleven large and medium counties. Error data for these counties indicates that almost half have experienced a reduction in their error rates. We believe more counties will continue to benefit from this approach. Given the magnitude and persistent nature of this category of error, we will continue to include this module in all IRIS reviews and will report on this area in our semiannual reports to you.

Implementation Status

Evaluate module effectiveness/ make improvements	- Completed October 1990
Issue summary report	- Completed May 1991
Evaluate corrective action for impact on errors	- April, 1993

Number

S-44-QC

Title

QC Error Case Correction Project

Description

Integrated Review and Improvement Studies (IRIS) conducted in FFY 1989 revealed that many Counties were not correcting error cases identified in Federal sample QC reviews. This is a serious concern. Correction of error cases is an important component of casework accuracy and an essential step to prevent additional error cites should the case be selected again for QC review.

To assist Counties in developing and implementing an effective case correction procedure, the Welfare Program Integrity Branch conducted a review of County Welfare Departments' practices in the correction of individual case errors. The purpose of this review was to discover the constraints which may be impeding the correction of individual case errors and to identify effective procedures and monitoring systems. A report summarizing the findings and highlighting successful County practices was sent to all Counties in May 1991. Through County inquiries and other contacts with the Counties, we believe that some Counties have utilized the information that was generated to establish their own improved systems for case correction.

In addition, throughout this project, IRIS teams will continue to collect data on the correction of QC error cases and to document County procedures in place for correcting these errors. During this review period, 12 Counties were reviewed by an IRIS team. A total of 122 federal sample QC cases with dollar errors were identified. Of these cases, 93 had corrective action taken and 29 were not acted upon or could not be located. These figures are comparable to those for FFY 1991. As a result, the IRIS reviews will continue to include a QC Error Case Correction module to identify and help remedy county deficiencies in this area. We will continue to evaluate this corrective action at six month intervals.

Implementation Status

Survey Counties on
case correction
procedures

- Completed December 1990

Analyze survey
findings

- Completed January 1991

Conduct on-site
analysis of case
correction procedures
in selected Counties

- Completed March 1991

Analyze findings and
develop recommenda-
tions

- Completed April 1991

Prepare report of
findings/successful
procedures and send
to Counties

- Completed May 1991

Include a QC Error
Case Correction Module
in County IRIS reviews

- Continue through FFY
FFY 1993

Evaluate correction
action

- April 1993

Number

S-45-QC

Title

Products For Shelter Deduction Errors

Description

Shelter Deduction has remained among the top three error elements for the last five review periods. During the current period, it is the second leading cause of dollar errors for ineligible, overissuances and underissuances combined. The Operations Improvement Bureau (OIB) developed this action in 1990 to assist Counties in addressing Shelter Deduction errors. The action included reviewing Corrective Action Plans submitted by many Counties for the last several review periods and drawing out products or ideas that the Counties have implemented to reduce Shelter Deduction errors. The emphasis was on those actions that the Counties felt had been effective in reducing such errors, or which were newly implemented and appeared to be appropriate for the problems they were designed to address.

Products were also gathered from the OIB Clearinghouse and from consultants' knowledge of products in use in Counties as a result of assessments or other contacts with the Counties. The action also included a review of the products by the Policy Implementation Bureau to rule out obvious misinterpretations of policy inherent in the products.

As a result of these steps, the OIB compiled a written collection of fourteen products and ideas ranging from client mailers to suggestions for data processing changes to alert workers to pending shelter deduction changes. This corrective action began in November with brainstorming by the Operations Improvement Bureau consultants and the resulting written package was mailed to all County Corrective Action liaisons in April 1991. The only milestone remaining is evaluation.

This area continues to be one of the top three error elements. During the period October 1991 through March 1992 the combined dollar error rate for Shelter was 22.3 percent a significant increase over the prior period rate of 13.7 percent. A combination of increased caseload size and a trend toward generic caseloads in preparation for the Statewide Automated Welfare System (SAWS) have contributed to this upward error trend.

In an attempt to counter this trend, the State Food Stamp regulations dealing with shelter change reporting were revised effective August 1, 1992. Previously Food Stamp households were required to report (and verify) any change in shelter expense. The new regulations only require that a change in shelter expense be reported if there is also a change in address. Based on FNS case review findings in Alameda and Sacramento Counties, we expect this regulatory change to decrease the shelter errors by approximately 23 percent by reducing the number of changes requiring case action.

Implementation Status

Compile County level corrective actions for Shelter Deduction	- Completed December 1990
Analyze County level corrective actions for Shelter Deduction	- Completed January 1991
Select appropriate County products and ideas	- Completed February 1991
Review selected products/ideas for policy interpretation	- Completed February 1991
Prepare written package for mailing	- Completed March 1991
Mail written package to County liaisons	- Completed April 1991
Evaluate corrective action	- Completed April 1992
Expand corrective action through regulation change	- August 1992
Evaluate corrective action	- April 1993

Number

S-46-QC

Title

Seven County Partnership Effort

Description

Since FFY 1986, California's Food Stamp error rate has been above the national average and the Federal tolerance level. The Food and Nutrition Service (FNS) and the State Department of Social Services (SDSS) collaborated on a new project to reduce Food Stamp error rates in the seven largest caseload Counties in an effort to bring the Statewide error rate below the Federal tolerance level in FFY 1992.

The seven Counties which agreed to participate in this project are: Alameda, Fresno, Los Angeles, Orange, Sacramento, San Bernardino and San Diego. Three of these Counties (Los Angeles, Fresno and San Diego) had previously been designated "intensive focus" Counties by SDSS and were already receiving intensified attention by Accuracy Improvement (AIM) Consultants. Additionally, the State Fiscal Year 1992 had already been designated as the Year of Food Stamps.

An initial meeting was held in August 1991 with State, Federal and County staff to discuss ideas relevant to the group's intended purpose and its method of operation. A second meeting was held in October 1991 to generate commitment from the participating seven County Welfare Directors and to further discuss the group's purpose and methodology. A third meeting was held in February 1992 to discuss specific goals and group tasks. A fourth meeting held in April 1992 focused on a Los Angeles County developed shelter case proposal.

All three levels committed to short term and long term error reduction actions. FNS agreed to consider all County and SDSS recommendations for review and revision of problematic Federal policies, procedures and program provisions. FNS committed to pursue program improvements within their legal and fiscal constraints. Counties committed to refocusing their energies on operations improvements and contributing to SDSS and FNS project activities. SDSS modified its IRIS schedule and scope to allow an expanded IRIS review in each of the largest seven Counties. An IRIS error reduction module was added to focus on reducing the reviewed County's error rate and/or assess the effectiveness of corrective actions already underway and/or assess the

transferability of exemplary practices into or from the reviewed County. County management collaborated with SDSS IRIS staff to prescribe the focus of the error reduction module. AIM consultants also intensified their contacts and activities with these Counties.

This corrective action has been extended and expanded to include an error reduction module in the upcoming IRIS reviews (for the FFY 1993) of all large Counties. This was done because of the success this error reduction module enjoyed in the seven largest Counties. The Counties were able to benefit from this module in large part because they were directly involved in determining the aspects of their operations to be included in the error rate reduction review. In this way the Counties were able to utilize the expertise of IRIS team members and their own staff working together to attempt to resolve pre-identified County problems. The State's Plan will continue to report on this corrective action during the life of this project.

Implementation Status

Compile barriers to Food Stamp Program integrity and brainstorm suggestions for eliminating/mitigating them

- Completed May 1991

Meet with seven large Counties to discuss ways to pursue above suggestions

- Completed August 1991

Meet with seven large Counties to secure commitment to project

- Completed October 1991

Meet with seven large counties to discuss specific project goals and tasks

- Completed January 1992

All seven Counties will have an IRIS review with an error reduction module added to the normal IRIS scope. This will begin in October 1991 and continue through September 1992

- Projected completion in October 1992

All large Counties reviewed in FFY 1993 will have an error reduction module included in their IRIS

- Projected completion in October 1993

PART II

COUNTY LEVEL ACCURACY IMPROVEMENT

1. ERROR RATE DATA ANALYSIS

Error rates for individual counties are displayed in Charts 15 and 16. The results of the county QC reviews for the October 1991 through March 1992 review period are shown in Chart 15. Chart 16 presents the cumulative payment error rates (CPEs) for the counties for the last four review periods. This information assists the Operations Improvement Bureau in identifying error rate trends in the counties and recognizing superior or improved performance.

Thirty-three counties reported their error rates for the October 1991 through March 1992 review period. Because of its large caseload size, error rates for Los Angeles County are derived from its portion of the federal sample which is completed by State staff.

A comparison of county QC review findings for the October 1991 through March 1992 period with findings for the previous period reveals that CPEs increased in 15 counties and decreased in 18 counties. Overall, 23 counties (70 percent of the reporting QC counties) had CPEs below the federal tolerance level of 10.31 percent recorded in FFY 1991.

County QC review findings represent the best information available on specific county error rates. The State, however, does not oversee the county sampling and review processes nor validate the results.

CHART 15

FOOD STAMP COUNTY PAYMENT ERROR RATES FOR INELIGIBLES AND OVERISSUANCES, UNDERISSUANCES, AND CUMULATIVE OCTOBER 1991 - MARCH 1992

	<u>Ineligibles and Overissuances</u>	<u>Underissuances</u>	<u>Cumulative*</u>
Alameda	4.9%	3.8%	8.7%
Butte	5.2	0.7	7.5
Contra Costa	2.3	2.4	4.7
Fresno	9.5	6.9	16.4
Humboldt	3.9	0.7	4.6
Imperial	7.6	5.3	12.9
Kern	5.5	1.9	7.4
Kings	2.6	2.9	5.5
Los Angeles	6.3	5.1	11.4
Madera	4.2	4.1	8.3
Mendocino	8.7	2.2	10.9
Merced	N/A	N/A	N/A
Monterey	8.4	3.1	11.4
Orange	9.5	6.3	15.8
Placer	1.9	1.4	3.3
Riverside	4.0	3.3	7.3
Sacramento	4.9	4.3	9.2
San Bernardino	8.1	2.6	10.7
San Diego	4.5	2.0	6.5
San Francisco	6.0	1.5	7.5
San Joaquin	3.5	2.3	5.8
San Luis Obispo	6.5	2.8	9.4
San Mateo	5.5	2.2	7.7
Santa Barbara	7.6	3.5	11.1
Santa Clara	3.9	1.9	5.7
Santa Cruz	4.1	3.0	7.1
Shasta	6.4	2.0	8.4
Solano	4.7	3.6	8.3
Sonoma	3.0	1.7	4.7
Stanislaus	4.5	1.4	5.9
Tulare	14.5	4.8	19.3
Ventura	3.0	1.7	4.7
Yolo	11.7	0.7	12.4
Yuba	3.7	1.3	5.0

Data source information: Data are from the State QC sample for all Counties except Los Angeles. Los Angeles County data are from the Federal QC sample.

* Ineligible and overissuance percentages and underissuance percentages may not add to cumulative error rates due to rounding.

N/A: Not available.

CHART 16

FOOD STAMP
COUNTY CUMULATIVE
PAYMENT ERROR RATES

<u>County</u>	<u>April 1990- September 1990</u>	<u>October 1990- March 1991</u>	<u>April 1991- September 1991</u>	<u>October 1991- March 1992</u>
Alameda	12.5%	12.1%	9.6%	8.7%
Butte	7.1	11.6	8.8	7.5
Contra Costa	5.8	11.7	6.1	4.7
Fresno	12.7	14.2	13.4	16.4
Humboldt	1.0	6.6	6.7	4.6
Imperial	17.7	18.4	14.0	12.9
Kern	3.0	3.1	4.7	7.4
Kings	7.5	7.9	8.1	5.5
Los Angeles	10.5	12.9	9.6	11.4
Madera	7.3	6.5	8.2	8.3
Mendocino	16.6	10.1	8.7	10.9
Merced	N/A	N/A	N/A	N/A
Monterey	13.1	16.3	17.9	11.4
Orange	9.6	10.4	8.0	15.8
Placer	6.4	5.0	6.1	3.3
Riverside	7.8	11.4	6.3	7.3
Sacramento	8.2	6.8	5.9	9.2
San Bernardino	9.6	12.6	8.0	10.7
San Diego	14.5	13.2	12.5	6.5
San Francisco	9.0	8.3	10.6	7.5
San Joaquin	9.6	6.1	7.6	5.8
San Luis Obispo	8.2	8.9	12.5	9.4
San Mateo	14.5	8.3	11.3	7.7
Santa Barbara	7.7	12.3	10.4	11.1
Santa Clara	5.9	4.5	6.6	5.7
Santa Cruz	7.0	8.1	6.9	7.1
Shasta	7.7	5.1	8.5	8.4
Solano	6.1	6.8	7.8	8.3
Sonoma	7.3	7.4	6.2	4.7
Stanislaus	7.7	9.7	6.3	5.9
Tulare	19.4	15.9	13.7	19.3
Ventura	15.1	9.4	11.1	4.7
Yolo	7.6	9.2	7.5	12.4
Yuba	5.9	4.9	2.8	5.0

Data source information: State QC sample findings for all Counties except Los Angeles. Federal QC sample findings for Los Angeles County.

N/A: Not available.

2. OVERVIEW OF COUNTY ACCURACY IMPROVEMENT ACTIVITIES

As can be seen from Section 1 of Chart 17, California Counties vary a great deal in size. California has categorized its Counties based on AFDC caseload size. Large QC Counties have AFDC caseloads greater than 15,000 cases. Medium QC Counties have AFDC caseloads of approximately 4,001 to 15,000. Counties with AFDC caseloads of 1,400 to 4,000 are listed as small QC Counties on Chart 17. The remaining Counties are non-QC (self-monitoring) Counties which do not perform QC reviews. However, they do conduct supervisory case reviews, quality assurance, or other internal monitoring procedures in order to identify errors and plan corrective action.

As a major error reduction activity, California Counties prepare and submit corrective action plans to the Operations Improvement Bureau twice a year. Plans are due February 1 and August 1 of each year. These corrective action plans constitute a major part of California's error reduction efforts. We believe that because County staff are directly involved in program administration at the local level, they are best able to analyze local problems and focus available resources for effective error reduction. Information on specific actions initiated by Counties can be obtained by reviewing the corrective action plans submitted by the individual Counties.

Each County is assigned an Operations Improvement Bureau consultant who reviews and evaluates the corrective action plans submitted by his or her respective Counties and responds with detailed written comments. Consultants also communicate with their Counties through telephone contacts and in-person visits. Because the Operations Improvement Bureau recognizes that many effective error reduction activities occur at the County level, the role of the consultant is twofold: to help Counties maintain their commitment to accuracy improvement and to assist Counties in acquiring the problem solving skills and tools necessary to develop effective corrective action.

As Section 2 of Chart 17 indicates, 35 Counties had active corrective action committees during the October 1991 through March 1992 review period. A significant part of accuracy improvement activities in these Counties involves the work of the corrective action committees which typically meet monthly to identify problems, generate ideas, develop solutions and review the effectiveness of prior corrective actions. Another major activity of these committees is to generate and maintain staff motivation for error reduction and error prevention. Operations Improvement Bureau consultants frequently attend these meetings to assist Counties in their corrective action efforts.

To further assist County staff in developing the necessary skills to reduce errors, Operations Improvement Bureau consultants work jointly with County staff to present problem solving training workshops. Two training formats are utilized: Quality Control/Accuracy Improvement Awareness and the Nine-Step Problem Solving Workshop.

The Quality Control/Accuracy Improvement Awareness Training is a half-day workshop especially for County line staff. It provides them with information about the quality control process in their County and about skills they can use to solve problems at the unit level. The Nine-Step Problem Solving Workshop is a full day training session designed to teach enhanced problem solving skills to supervisors, lead eligibility workers, managers and other staff directly involved in corrective action planning. The basic format is modified to meet the needs of the individual County. Refer to Part I, Section 2, of this Plan for further information about this training. During this review period, the Nine-Step Workshop was presented to members of Yolo County's Corrective Action Committee.

In addition to participating in training to hone their problem solving skills, staff of California Counties also enhance their error reduction capabilities by working together in regional networking groups. Section 3 of Chart 15 lists Counties that participate in these regional networks. Participation here allows Counties to gain information, discuss mutual concerns, and share solutions to common problems. Currently there are seven networking groups throughout the State: the Northern Counties Corrective Action Committee, the Mother Lode Corrective Action Committee, the Bay Area QC Committee, Southern Counties AFDC Task Force, the Southern Counties Quality Control/Corrective Action Subcommittee, the Southern Counties Food Stamp Task Force, and the Valley Nine Network. Staff from the Operations Improvement Bureau and other bureaus within the State Department of Social Services frequently attend these meetings to share information and lend their support.

County line staff also network through participation in regional conferences. Operations Improvement Bureau staff assist County regional groups in presenting five conferences each year. The Bay Area Counties Eligibility Workers Conference was held in October 1992 and the Northern/Mother Lode Counties Eligibility Workers Conference was held in May 1992. The Southern Counties Supervisors Conference was held in September 1992 and their Eligibility Workers Conference was held in June 1992. The fifth conference, a Supervisors Conference sponsored by the Valley Nine Network was held in March 1992.

These regional conferences provide line staff with the opportunity to share common concerns, discuss corrective action ideas, and acknowledge their key role in California's error reduction efforts.

The Operations Improvement Bureau Clearinghouse is another vehicle for sharing error reduction ideas. Corrective action products and tools are described in the Clearinghouse Catalog and are made available to Counties and other organizations upon request. Section 4 of Chart 17 lists the 33 Counties which requested products directly from the Clearinghouse during the October 1991 through March 1992 period. Operations Improvement Bureau consultants also made Clearinghouse products available to Counties as part of the consulting process. For more information on the Clearinghouse, see "Overview of State Accuracy Improvement Activities" in Part I of this Plan.

In sum, California's error reduction efforts are broad based. The common thread running through all these activities is an emphasis on assisting County staff in acquiring the skills, tools and motivation required for accurate casework.

CHART 17
COUNTY SUMMARY
April - September 1991

1. Counties are categorized by AFDC caseload size as follows:

Large QC Counties (More than 15,000 AFDC cases)

Alameda	Los Angeles	San Bernardino
Contra Costa	Orange	San Diego
Fresno	Riverside	San Joaquin
Kern	Sacramento	Santa Clara

Medium QC Counties (4,001 - 15,000 AFDC cases)

Butte	San Francisco	Sonoma
Humboldt	San Mateo	Stanislaus
Imperial	Santa Barbara	Tulare
Merced	Shasta	Ventura
Monterey	Solano	

Small QC Counties (1,400 - 4,000 AFDC cases)

Kings	Placer	Yolo
Madera	San Luis Obispo	Yuba
Mendocino	Santa Cruz	

Self-Monitoring (Non-QC) Counties (less than 1,400 AFDC cases)

Alpine	Lake	Plumas
Amador	Lassen	San Benito
Calaveras	Marin	Sierra
Colusa	Mariposa	Siskiyou
Del Norte	Modoc	Sutter
El Dorado	Mono	Tehama
Glenn	Napa	Trinity
Inyo	Nevada	Tuolumne

2. Counties with corrective action committees:

Alameda	Mendocino	San Luis Obispo
Butte	Monterey	Santa Barbara
Contra Costa	Napa	Santa Clara
El Dorado	Orange	Santa Cruz
Fresno	Placer	Shasta
Humboldt	Riverside	Sonoma
Imperial	Sacramento	Solano
Kern	San Bernardino	Stanislaus
Kings	San Diego	Sutter
Lake	San Francisco	Tulare
Los Angeles	San Joaquin	Ventura
Madera		Yolo

3. Counties participating in regional networking groups:

Valley Nine Network

Fresno	Madera	San Joaquin
Kern	Mariposa	Stanislaus
Kings	Merced (not participating)	Tulare

Bay Area QC Committee

Alameda	Sacramento	Santa Clara
Contra Costa	San Benito	Santa Cruz
Marin	San Francisco	Solano
Monterey	San Mateo	Sonoma
Napa		Yolo

Mother Lode Corrective Action Committee

Alpine	El Dorado	Sierra
Amador	Mariposa	Sutter
Butte	Nevada	Tuolumne
Calaveras	Placer	Yuba
Colusa		

Northern Counties Corrective Action Committee

Butte	Lake	Shasta
Del Norte	Lassen	Siskiyou
Glenn	Mendocino	Tehama
Humboldt	Plumas	Trinity

Southern Counties Quality Control/Corrective Action Subcommittee

Imperial	Orange	San Luis Obispo
Inyo	Riverside	Santa Barbara
Kern	San Bernardino	Ventura
Los Angeles	San Diego	

Southern Counties Food Stamp Task Force

Imperial	Riverside	San Luis Obispo
Kern	San Bernardino	Santa Barbara
Los Angeles	San Diego	Ventura
Orange		

4. Counties requesting products from the Corrective Action Bureau Clearinghouse:

Alameda	Lassen	Santa Cruz
Amador	Madera	Shasta
Butte	Mariposa	Sierra
Calaveras	Placer	Siskiyou
Contra Costa	Orange	Solano
Del Norte	Riverside	Sonoma
El Dorado	Sacramento	Stanislaus
Fresno	San Bernardino	Sutter
Humboldt	San Joaquin	Ventura
Kings	San Luis Obispo	Yolo
Lake	Santa Barbara	Yuba